

## **U.S. Department of Justice**

United States Attorney Southern District of New York

The Jacob K. Javits Federal Building 26 Federal Plaza, 37th Floor New York, New York 10278

March 6, 2025

## **BY ECF**

The Honorable Jeannette A. Vargas United States District Judge 500 Pearl Street New York, NY 10007

Re: United States v. Ho, 25-3 (JAV)

Dear Judge Vargas,

The parties respectfully submit this joint letter to request a modification of some of the conditions of the defendant's pretrial release. Specifically, the parties request the following conditions be modified:

- Travel is restricted to Southern District of New York, Eastern District of New York, Central District of California, and all points of travel between for court appearances. In addition, the defendant may travel within all districts within California subject to prior approval by Pretrial Services. The defendant is not permitted to enter a certain perimeter of the southern border to be set by Pretrial Services.
- Curfew is lifted. The defendant will continue to be subject to stand-alone GPS monitoring. The defendant is not permitted to enter any airports within the Central District of California without prior approval by Pretrial Services for Court appearances. Pretrial Services will set the perimeter.
- No trading by the defendant's company, One R Squared in any financial products, including securities, commodities, or cryptocurrency. Trading by the defendant is

limited to liquidating pre-existing investment portfolio and non-intraday trading to meet living expenses and legal fees.

Respectfully submitted,

MATTHEW PODOLSKY Acting United States Attorney

by: /s/
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